

**REMARKS/ARGUMENTS**

Reconsideration of this application is respectfully requested.

The rejection of claims 1-4, 12-15 and 17 under 35 U.S.C. §102 as allegedly anticipated by Sit '336 is respectfully traversed.

Sit describes a method of establishing a "reverse HTTP connection" to send messages through a firewall, so that messages from a remote processor (outside the firewall) are received by the local processor (behind the firewall) as "requests" (column 3 lines 42 to 29). This is done by creating a connection in the usual manner (wherein the processor behind the firewall receives a response to a connection request): column 3 lines 63 to 65. Subsequently, tunneled messages encapsulated within "requests" are sent by the remote processor to the local protected processor at the other end of the connection: column 3 lines 6 to 18.

The present invention does not use tunneling. As discussed in earlier correspondence (using claim 1 as an example): two controllers (11, 20) sited on different network sides exchange control messages between them. There is no disclosure or suggestion in Sit of more than one controller, nor the exchange of "control messages" between them. The only controller explicitly mentioned is a client device management gateway (CDMG) (125).

In any event, the Sit requests (170, 171, 173,...) are not analogous to the "control messages" of the applicant's invention. The initial Sit request (170) is described in

column 3 line 63 to column 4 line 3, as being the signal sent by the CDMG to initiate communications between the two processors (122, 157). If analogous to anything, this might be analogous to the applicant's initial establishment of a connection as shown in Figure 7.

The "control message", of e.g., of claim 1, on the other hand, refers to those messages sent to control devices such as "Equipment" (1, 2) in Figure 2 behind the firewall. As is clear within the claim itself, such control messages are used in e.g. the system of claim 1 for "remotely controlling the operation of at least one device over a communications network". There is in Sit, no "device" which is remotely controlled by the request (170): since the connection is made via the CDMG and the remote processor (157), the skilled person would not understand that this was also the device being remotely controlled, but would expect another device to exist at the remote site - this feature is missing from Sit.

In the applicant's exemplary context of video conferencing (page 7 lines 17 onwards), the equipment (2) shown in Figure 4 comprises a multipoint control unit (MCU). The control/interface unit (32) sends "control information" to set up the conference (page 7 line 33 to page 8 line 10). Thus, the "control messages" (of, e.g., claim 1) are those, for example, for setting up a conference as described on page 8 lines 15 onwards, to enable the conference control system (23) of Figure 4 (which is an embodiment of the control station (11) in Figure 1) to remotely control the MCU (2) in Figure 4 (an embodiment of the equipment (1, 2) in Figure 2).

Given such fundamental deficiencies of Sit with respect to independent claim 1 as discussed above, it is not believed necessary at this time to discuss additional deficiencies of Sit with respect to other features of claim 1 and/or the additional features brought out by the rejected dependent claims. Suffice it to note, as a matter of law, it is impossible for any reference to anticipate a claim unless it teaches each and every feature of that claim.

The rejection of claims 18-20, 23-25, 29 and 30 under 35 U.S.C. §102 as allegedly anticipated by Crichton '716 is also respectfully traversed.

Crichton also describes tunneling as a solution of getting messages through a firewall. This is done by using a middle proxy (26) which is located outside the firewalls of both machines (222 and 221) which seek to communicate with each other, in the manner described in column 4 lines 42 to 50.

Applicant's claim 18 (and those dependent thereon) cover a method for "remotely controlling the operation of at least one or more devices", and the skilled person would therefore understand that the "control messages" referred to in such claims, are sent by a "control station" for the purpose of the remote operation of devices.

If the Crichton X-client (222) and X-server (211) are taken to be analogous to applicant's first controller and second controller of, e.g., claim 18, then there is again no separate or other "device" the operation of which is remotely controlled by control messages. If one of either the X-client (222) and the X-server (211) is deemed to be the remotely-controlled device, then one of either the first or second controller is missing.

If the middle proxy (26) of Crichton is taken to be analogous to the control station of, e.g., claim 18, there is no disclosure or suggestion that it sends control messages.

Quite the reverse is true as the connection between the X-client (222) and the X-server (211) is created by the end proxies (213, 223) sending to the middle proxy setup information (column 5 lines 1 to 8).

In any event, the Examiner's apparent conclusion that a connection between the X-client (222) and the X-server (211) is initiated by a "control message" (as apparently asserted for Sit) is inaccurate for the reasons discussed above for Sit.

Neither Sit nor Crichton (or any combination thereof) anticipates or makes obvious the applicant's claims. In view of there being no disclosure or suggestion of the invention as claimed owing to the missing elements or features of the claimed invention in these citations, the remaining combinations do not make good the deficiencies to make good the finding against the application.

Independent claim 30 requires remotely monitoring operations of at least one device over a communications network which includes first and second network sides and means for controlling access between the first and second sides wherein a connection to a first controller connected to the network on the second network side is initiated from a monitor station connected to the network on the first network side -- and where event information relating to operation of such at least one device is sent from the second controller to the first controller and then from the first controller to the monitor station.

Given such fundamental deficiencies of Crichton with respect to the above discussed features of independent claims 18 and 30, it is not believed necessary at this time to discuss additional deficiencies of Crichton with respect to other features of these independent claims or the added features of rejected dependent claims. Suffice it to note, as a matter of law, it is impossible for a reference to anticipate a claim unless it teaches each and every feature of such claim.

The rejection of various claims as allegedly being made "obvious" under 35 U.S.C. §103 based on Sit taken alone or in combination with Wegener '891 or based on Sit/Wegener in view of Shaw '728 or based on Sit/Crichton or based on Crichton/Sit or based Crichton/Shaw or based on Crichton in view of Johnson '784 are all respectfully traversed.

Fundamental deficiencies of both Sit and Crichton (whether taken singly or in combination) have already been noted above with respect to independent claims 1, 18, 19 and 30. The additional references do not supply those deficiencies. Accordingly, it is not believed necessary at this time to explain further deficiencies of the allegedly "obvious" numerous combinations of references with respect to other features of the rejected claims.

HERON, A. et al.  
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Accordingly, this entire application is now believed to be in allowance condition  
and a formal Notice is respectfully solicited.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

By: Larry S. Nixon  
Larry S. Nixon  
Reg. No. 25,640

LSN:vc  
901 North Glebe Road, 11th Floor  
Arlington, VA 22203-1808  
Telephone: (703) 816-4000  
Facsimile: (703) 816-4100